

REMARKS

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3 1. Claims 1-4, 20-23, and 36-42 were and are now pending. No claims have been
4 amended or cancelled. A clean copy of the presently pending claims is now of record as
5 set forth in Amendment B to the captioned patent application that was mailed on January
6 7, 2002 (herein after, Amendment B). Reexamination and reconsideration of the
7 application are requested.

8 9 2. Rejections under 35 U.S.C. 102(e) and 103(a)

10 Claims 1-4 and 36 were rejected in the Office Action under pre-AIPA 35 U.S.C.,
11 102(e) as being anticipated by Haff et al. (US Patent No. 6,219,669). Claims 20-23 and
12 37-42 were rejected in the Office Action under 35 U.S.C. 103(a) as being unpatentable
13 over Haff et al. (US Patent No. 6,219,669) in view of Kolling et al. (US Patent No.
14 5,963,925). The Applicant respectfully traverses the rejections and requests
15 consideration of the following.

16 17 3. Data vs. File

18 The term "data" can be distinguish from the term "file". A "file" is a collection of
19 data or information that has a name, called the filename. Almost all information stored in
20 a computer must be in a file. There are many different types of files: data files, text files,
21 program files, directory files, and so on. A data file is not limited to contain only one
22 particular type of data, but rather can contain many different particular types of data. In
23 contrast, "data" is distinct pieces of information, usually formatted in a special way. All
24 software is divided into two general categories: data and programs. Programs are
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collections of instructions for manipulating data.

4. Haff et al. Teach File Packets Particularized by Files, Not Data

Haff et al. teach at Col. 22, lines 10-16 a user interface by which a user can make a selection, by a "drag and drop feature", of certain files from all files that are displayed on the user interface. While Haff et al. do not teach that all of the selected files contain the same particular type of data or that each of the selected files contains many different particular types of data, Haff et al. do teach that the files that are selected by the user are those files that the user wishes to transmit.

Haff et al. teach that the user-selected files are formed into a "file packet" that contains the user-selected files. In contrast, Haff et al. do not teach that file packet is formed so as to be particularized to contain and carry a particular type of data. As such, Haff et al. do not teach, suggest, or imply that a file packet is to contain any particular type of data, but rather is to contain only those particular files that were selected by a user without *any* limitation or requirement as to the type of data that is in each file *or* as to the type of data in each file packet. Accordingly, Haff et al. disclose a file packet based on file selection, not data selection.

5. Applicants Disclose Parcel Components Particularized by Data, Not Files

For a better understanding of the present invention, we review Figure 5 and its description in the specification, at page 18, lines 4-21, as follows:

The BIS gateway 80 has a parcel manager 134 to transfer billing data and other information from the BIS to the service center. The parcel manager transfers the data in "parcels". The parcel manager 134 is responsible for reliably transferring parcels from the BIS 34 to the service center and tracking the parcels as they go from computer to computer. It

1 is this tracking function that enables the management console UI 100 to
2 show the location and status of particular parcels. The parcel manager 134
3 is described below in more detail with reference to Fig. 7.

4 Atop the parcel manager 134 are a set of handlers that collectively
5 form an enterprise interface into the parcel manager. The interface
6 handlers handle *requests to create different types of parcels, depending*
7 *upon the type of information being transferred* to the service center. The
8 enterprise interface handlers include a consumer information handler 136,
9 a payment handler 138, a batch handler 140, and a template handler 142.
10 The handlers facilitate *creation of particularized parcels for shipment* to
11 the service center. For instance, the batch handler 140 facilitates creation
12 of statement batch parcel to be transferred to the service center. The
13 handlers 136-142 are preferably implemented as COM (component object
14 model) objects and are called via a set of enterprise integration APIs.
15 (emphasis added)

16 The foregoing text presents the concept of particularization of the parcel contents. As
17 designed, each parcel is to be limited as to its content. This limitation placed upon the
18 content of the parcel is dictated by a request. The request is for a particular data type and
19 is directed to a particular type of interface handler. The particular interface handler to
20 which a particular request is directed is responsible for the requested particular type data
21 in the particular type of parcel. As such, the Applicant provides for a particular type of
22 interface handler to assemble a particular type of parcel to be made up of a particular type
23 of data. The application provides for at least four (4) particular types of data: consumer
24 information, payment, statement batch, and template.

25 The Applicant respectfully submits that the assembly of a file packet from user
selected files taught by Haff et al. is nonanalogous to the recited parcel limitation in each
of the independent claims. Moreover, the parcel limitation of the claimed invention is
particular as to the type of data. This limitation is further narrowed to be *recited as being*
selected from the group consisting of consumer information data, payment data, batch
statement data, and statement template data.

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3 **6. Comments on Kolling et al.**

4 The comments expressed in Amendment B with respect to Kolling et al. and the
5 pending claims are incorporated herein by reference.
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7 **7. Additional Comments**

8 Neither Haff et al. nor Kolling et al. teach, suggest, or imply, either alone or in the
9 combination, a file packet that is particularized or otherwise restricted as to its contents
10 by a particular type of data. The present specification proposes to construct parcels of
11 data, where each parcel can be limited to one of at least four different kinds of data.
12 Inherent benefits are realized from this concept. In addition to the direct benefit of the
13 reliable transfer of specifically requested parcels as they go in a network from one
14 computer to another between the biller and the service center, the data traffic on the
15 network is not congested by unrequested data. Network congestion is avoided by the
16 claimed invention in that the data in each parcel is particularly limited to that data that
17 was specifically requested.
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19 Neither Haff et al. nor Kolling et al. teach particularly requested and composed
20 parcels of data. Since the file packets of Haff et al. are not limited to be particularized to
21 contain and carry a particular type of data that was requested, Haff et al. do not achieve
22 this benefit of reduced network congestion. Neither do the electronic statement
23 presentment systems taught by Kolling et al. achieve this benefit of reduced network
24 congestion.
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1 **8. Conclusion**

2 In sum, neither Haff et al. nor Kolling et al. teach, suggest, or imply, either alone
3 or together, the combinations of the recited elements in the pending independent Claims
4 1-4. The Applicant respectfully submits that pending Claims 1-4 and 36 are not
5 anticipated by Haff et al. and that, with respect to pending Claims 20-23 and 37-42, a
6 *prima facie* case of obvious has not been made out. As such, the Applicant respectfully
7 maintains that the pending independent Claims 1-4 are allowable, as are the claims
8 respectively depending therefrom. Accordingly, the present application is in condition
9 for allowance. Reconsideration of the rejections is requested. Allowance of Claims 1-4,
10 20-23, and 36-42 at an early date is solicited.

11 Respectfully Submitted,
12 Lee & Hayes PLLC

13 Dated: 7/26/02

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Specification Amendment Mark up under 37 C.F.R. § 1.121(b)1(iii)

A. In accordance with 37 C.F.R. § 1.121(b)1(iii), a marked up version of the amended paragraph in the specification at Page 8, lines 14 through 26 is submitted by this separate paper as follows:

The template is preferably constructed using as Active Server Pages, a technology introduced by Microsoft Corporation. An active server page, or "ASP", allows a user to define templates using a combination of a hypertext language (e.g., HTML) and a scripting language, such as Visual Basic Script (or "VBS") or JScript from Microsoft Corporation, perl, python, REXX, or tcl. The HTML language defines the basic structure of the billing statement and the scripting language defines which data is inserted into the appropriate fields. The scripting instructions are set apart by special delimiters. When an ASP file is read and rendered, the scripting instructions within the delimiters are executed to fill in the billing data. The result is a billing statement in a pure hypertext document. Active Server Pages are described in documentation available from Microsoft Corporation of Redmond, WA, USA.[s Web site "www.microsoft.com", under the section Internet Information Services. This text is hereby incorporated by reference.]

1 B. In accordance with 37 C.F.R. § 1.121(b)1(iii), a marked up version of the
2 amended paragraph in the specification at Page 26, line 17 through Page 27, line 2 is
3 submitted by this separate paper as follows:

4 Fig. 7 shows the BIS parcel manager 134 in more detail. Applications 220
5 running at the biller computer system use the parcel manager 134 to create a parcel, send
6 the parcel across to a computer at the service center, and receive notifications on the
7 status and location of the parcel as it moves from one machine to another. Applications
8 22[0]0 interface with the parcel manager 134 via the APIs in the enterprise interface 222,
9 which consists of the consumer information handler 136, the payment handler 138, the
10 batch handler 140, and the template handler 142 (see Fig. 5). The management console
11 98 works with the parcel manager 134 to track the parcels between computers. It is noted
12 that the parcel manager 154 residing at the service center gateway 86 is essentially the
13 same, and is not described in detail.

1 C. In accordance with 37 C.F.R. § 1.121(b)1(iii), a marked up version of the
2 amended paragraph in the specification at Page 20, line 18 through Page 21, line 2 is
3 submitted by this separate paper as follows:

4 The BIS 34 is implemented as software modules stored in program
5 memory 192. The modules—billing data translator module 2[8]7, statement
6 designer module 62, rules manager module 66, resource manager module 70, and
7 advertising manager module 74, management console module 98, accounts
8 receivable translator module 94, payment translator module, and gateway 80—run
9 on the operating system. In a preferred implementation, the resource manager 70
10 and advertising manager 74 are implemented as HTML development software,
11 such as Visual InterDev from Microsoft Corporation. The statement designer 62
12 and the rules manager 66 are implemented as extensions of the Visual InterDev
13 software. The billing data 60, templates 64, rules 68, resources 72, advertising
14 information 76, and payment/remittance information 92 are stored in the data
15 memory 186.
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1 D. In accordance with 37 C.F.R. § 1.121(b)1(iii), a marked up version of the
2 amended paragraphs in the specification at Page 49, line 23 through Page 50, line 19 are
3 submitted by this separate paper as follows:

4 Exemplary Task 2: Fig. 10 shows a method for handling a batch of
5 billing data for an installed template. The biller creates billing data using
6 its legacy billing system. The billing data is passed through the statement
7 data translator 2[8]7 (step 290). The translator instantiates a statement
8 batch object to hold the data (step 292). The translator 2[8]7 specifies the
9 biller and the template to be associated with the billing data (step 294) and
10 validates the specified biller and template against records of authorized
11 billers and installed templates received from the service center (step 296).
12 This validation process ensures that the billing data is for an approved
13 biller recognized by the service center and is for a template that is installed
14 at the service center. The statement translator 2[8]7 then loads data into
15 the statement batch object. The statement batch object accepts data that
16 complies with the available fields in the industry schema tables.

17 The BIS gateway assigns a batch ID to the statement batch and a
18 statement ID to each statement in the batch (step 298). The statement data
19 translator 2[8]7 calls via the batch handler 140 into the parcel manager
20 interface 224 to create a statement batch parcel (step 300). The batch
21 parcel contains the following information: biller ID, batch ID, template
22 ID, template rule ID, resource table records, statement table records, and
23 industry table records. The batch parcel is sent to the service center during
24 the next connection with the service center (step 302). The service center
25 processes the batch parcel and loads the data into the service center

1 database (step 304). The service center's parcel manager generates and
2 returns a bulletin indicating that the batch has been received and loaded at
3 the service center (step 306).
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